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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BOARD OF TRUSTEES OF THE
TEAMSTERS LOCAL 631 SECURITY
FUND FOR SOUTHERN NEVADA

Plaintiff,

v.

JAIME CANTORAN, an individual; AMBER
ORTEGA, an individual,

Defendants.

CASE NO.:

COMPLAINT

Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. This action arises under the Employee Retirement Income Security Act of 1974 (“ERISA”), 29 U.S.C. §§ 1001-1500 and the Court has original jurisdiction pursuant to 29 U.S.C. § 1132(e). Venue is proper pursuant to 29 U.S.C. § 1132(e)(2).

PARTIES

2. Plaintiff is the Board of Trustees of the Teamsters Local 631 Security Fund for Southern Nevada (the “Plan”) and consists of fiduciaries for purposes of ERISA.

3. Defendant Jaime Cantoran (“Cantoran”) is an individual currently residing in Clark County, Nevada.

15. The Plan has requested that Cantoran and Ortega repay the Plan for the benefits Ortega wrongfully received, but they have refused to do so.

1 WHEREFORE, Plaintiff prays for relief as follows:

- 2 1. Equitable relief in the form of a judgment in favor of the Plan against Cantoran
3 and Ortega, jointly and severally, in the amount of benefits paid by the Plan on behalf of Ortega;
4 2. For attorney's fees and costs incurred herein;
5 3. Interest at the employer contribution rate of eighteen percent (18%); and
6 4. For such other and further equitable relief as the Court deems proper.
7

8 Dated: February 13, 2019

BROWNSTEIN HYATT FARBER SCHRECK, LLP

9 /s/ Bryce C. Loveland

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